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October 16, 2022

Via ECF

The Honorable Michael A. Hammer,
United States Magistrate Judge
Martin Luther King, Jr. Federal Building
And Courthouse, 2nd Floor
50 Walnut Street
Newark, New Jersey 07102

Re: *Bianchi v. Samsung Electronics America, Inc. et al.*
Civil Action No.: 2:17-cv-01263-CCC-MAM

Dear Judge Hammer:

This firm, along with Squire Patton Boggs (US) LLP, represents defendant, Samsung Electronics America, Inc. (“SEA”), in the above-referenced matter. As per Your Honor’s direction in the Order of July 18, 2022, we are providing a joint status report.

The parties continue their considerable progress and are in the final stage implementing a novel and complex Settlement Agreement reached with the assistance of the Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.). As indicated in our last report, we anticipate the process will finish-up in another few months and close to the end of the year.

Respectfully,

/s/ James J. O'Hara
JAMES J. OHARA
On behalf of Defendant,
Samsung Electronics America, Inc.

Respectfully,

/s/ Kevin Laukaitis
KEVIN LAUKAITIS
On behalf of Plaintiffs

Cc: Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.)